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November 10, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically, on Monday, November 9, 2015, counsel for New GM and Lead Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman informing the District Court of Your Honor’s *Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues* (“**Decision**”) and certain implications of the Decision on the bellwether trials. A copy of the Joint Letter, without its exhibit (the Decision), is attached hereto.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

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SD/hs
Encl.

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November 9, 2015

The Honorable Jesse M. Furman
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re: General Motors LLC Ignition Switch Litigation,*
14-MD-2543 (JMF)

Dear Judge Furman:

Counsel for General Motors LLC (“New GM”) and Lead Counsel for plaintiffs write to advise the Court of the Bankruptcy Court’s Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues (the “Decision”), which was issued earlier today and which is attached hereto as Exhibit 1. (09-50026, Docket No. 13533.) The parties met and conferred briefly today regarding the Decision, and respectfully request that the Court allow the parties until this Friday, November 13, 2015 to (1) continue to meet and confer regarding the impact of the Decision on the bellwether trial cases, and (2) submit a joint proposal for amending the complaints in the bellwether trial cases and for resetting the deadlines for submitting dispositive motions and jury instructions, as well as the deadline for New GM to respond to the amended bellwether trial complaints.

The parties further request that in the interim, the Court should hold in abeyance the dispositive motion deadline and deadline for submitting jury instructions for bellwether trial number 1 (*see* Order No. 78), and the answer deadlines for bellwether trial numbers 2-6 (*see* 9/29/2015 Memo Endorsement, Docket No. 1445), pending further order of the Court on these issues. As part of their meet and confer, the parties will also discuss whether and to what extent the remaining schedule for motions *in limine* may need to be adjusted in light of the Decision.

KIRKLAND & ELLIS LLP

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Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

/s/ Andrew B. Bloomer, P.C.

Counsel for Defendant General Motors LLC

cc: The Honorable Robert E. Gerber
MDL Counsel of Record